

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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DONQUEL PERRY  
4141 S. 60<sup>th</sup> St.  
GREENFIELD WI 53220

Case No.:

v.

PRIMEFLIGHT AVIATION  
7135 CHARLOTTE PIKE  
SUIT 100  
NASHVILLE, TN 37209  
UNITED STATES OF AMERICA

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Plaintiff's Complaint for violations under Title VII; Discrimination  
against race

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*Now before the Court comes the Plaintiff Donquel Perry, by and through his Attorney Ryan Kastelic of Kastelic Law Office LLC., and states the following:*

1. Mr. Donquel Perry is an African American Male, resident of Milwaukee County and presently resides at 4141 S. 60<sup>th</sup> St. Greenfield WI 53220.
2. Primeflight Aviation is a foreign business corporation with its principal office located at 7135 Charlotte Pike Suite 100 Nashville, TN 37209
3. The Plaintiff worked at the Milwaukee County Airport for 23 years, first under an entity named ITS, then SMS and then for 10 years for the Defendant. These companies are sister companies owned by SMS Holdings.
4. Shortly after switching to Primeflight the Plaintiff was promoted to Supervisor. He was then promoted to Account Manager about 2 years prior to his termination. At this point in time a new manager became responsible for the Plaintiff.
5. The new Manager, hereinafter "Manager," began to fault the Plaintiff for incorrect incidents, occurrences that didn't happen and generally applied an arbitrary level of scrutiny. For instance the Manager claimed that the Plaintiff was absent when he was present.
6. Prior to Manager's becoming the Plaintiff's direct supervisor the Plaintiff worked for the Defendant largely without incident.

7. The Manager claimed in one instant that the Plaintiff failed to perform a proper audit, that the Plaintiff did not pass through the appropriate number of security doors. This allegation resulted in the Plaintiff's termination. After his termination Plaintiff videotaped his audit route to show that passing through the extra security doors was unnecessary and counterproductive.
8. The Plaintiff was the third black supervisor who was terminated under this Manager within a period of 2 ½ to 3 years. Each Supervisor was terminated for seemingly minor offenses.
9. Another employee Salvador (Hispanic) who often appeared overwhelmed and unable to perform his tasks received a promotion, to Aircraft Manager and a pay raise several months prior to the termination of the Plaintiff.
10. Prior to his promotion to Account Manager the Plaintiff's predecessor(white) managed multiple violations, significantly more severe than those of the Plaintiff before he was finally terminated.

Claim I: Disparate Treatment and Discriminatory Termination of Employment.

11. The Plaintiff incorporates by reference paragraphs 1 through 10.
12. The Defendant's termination of the Plaintiff's employment violated 42 USC 2000(a)(1).

Wherefore the Plaintiff requests the following relief:

- A. An award of full back pay and appropriate compensatory damages.
- B. An award of payment for emotional distress caused by the termination of the Plaintiff's employment.
- C. An award of reasonable Attorneys fees and whatever other compensation that the Court deems just.

*Dated this 30<sup>th</sup> day of May 2017.*

By: s/ Ryan Kastelic  
Ryan Kastelic  
*Attorney for the Plaintiff*  
230 W. Wells St. STE 610  
Milwaukee WI, 53203  
Telephone: 414-395-0402  
Bar No. 1079772